

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

BMG RIGHTS MANAGEMENT (US) LLC,  
*et al.*,

*Plaintiffs,*

v.

COX COMMUNICATIONS, INC, *et al.*,

*Defendants.*

Civil No. 1:14-cv-1611 (LO/JFA)

**DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE EVIDENCE AND TESTIMONY  
AS TO CERTAIN INTERNAL COX EMAILS AND COMMUNICATIONS  
CONCERNING COX'S TERMINATION POLICIES AND TREATMENT OF ALLEGED  
INFRINGEMENTS**

Defendants respectfully move this Court to enter an order precluding Plaintiffs from offering evidence and testimony as to certain internal Cox emails and communications concerning (a) Cox's termination policies, (b) Cox's treatment of alleged infringers, and (c) certain opinions expressed by Cox employees concerning Rightscorp and/or the DMCA.

Defendants state the specific grounds for their motion in Defendants' accompanying Memorandum of Law in Support of Defendants' Motion *in Limine* to Preclude Evidence and Testimony as to Certain Internal Cox Emails and Communications Concerning Cox's Termination Policies and Treatment of Alleged Infringers.

Dated: July 20, 2018

Respectfully submitted,

/s/ Thomas M. Buchanan

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**CERTIFICATE OF SERVICE**

I certify that on July 20, 2018, a copy of the foregoing **Defendants' Motion *in Limine* to Preclude Evidence and Testimony as to Certain Internal Cox Emails and Communications Concerning Cox's Termination Policies and Treatment of Alleged Infringers** was filed electronically with the Clerk of Court using the ECF system which will send notifications to ECF participants.

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